

EXHIBIT B

INTERROGATORY NO. 1: What is your full name, badge or identification number, and date of birth?

ANSWER:

Objection as to relevance of date of birth. Notwithstanding objection, Justin C. Voss, DSN 28532.

INTERROGATORY NO. 2: If you were ever enjoined from engaging in any conduct by a state or federal court decree, identify the court, title and docket number of the case, date of decree, and nature of the conduct enjoined.

ANSWER:

N/A.

INTERROGATORY NO. 3: State specifically and in detail the exact sequence of events that took place during any incident between you and Plaintiff Carolyn Mitchell, including but not limited to the events on May 8, 2004.

ANSWER:

See my report. The only addition to that report would be that I contacted Ms. Mitchell during the initial debrief.

INTERROGATORY NO. 4: Have you received any discipline from the Anchorage Police Department of Anchorage Municipality as a result of the incident involving Plaintiff Carolyn Mitchell on May 8, 2004? If yes, state:

- a. the nature of the discipline;
- b. the facts on which such discipline was based;
- c. who ordered and who administrated the disciplinary action.

Officer Justin Voss's Responses to Plaintiff's ROG's & RFP's
Case No. 3:05-cv-00273-JWS Exhibit B – Page 2

**MUNICIPALITY
OF
ANCHORAGE**

OFFICE OF THE
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ANSWER:

No.

INTERROGATORY NO. 5: On May 9, 2004, you filed a police report supplemental for Case 04-20935, defendant bates stamped 000009 (attached), in this document you wrote the following: "MITCHELL matched the description of the suspect." Explain in detail how, and to what extent, plaintiff Mitchell "matched" the description of the person who robbed the Wells Fargo at Sears Mall.

ANSWER:

See dispatch log, Bates Nos. 26-31. TEXT:PER GUARDIAN SECURITY, BFA IN WELLS FARO BANK WITH GUN, HAD SOME BLACK BAGS ON HER ARM , SHE IS CURRENTLY IN THE MALL WALKING TOWARD SEARS TEXT:SUSP IS BFA, HEAVEY SET, DARK BLU SHIRT, DRK SUNGLASSES

INTERROGATORY NO. 6: On May 9, 2004, you filed a police report supplemental for Case 04-20935, defendant bates stamped 000009 (attached), in this document you wrote the following: "I held her at guard and covered OFC HENIKMAN as he took MITCHELL into custody." Explain in detail what you meant by "held her at guard," and in your explanation specifically mention whether you made use of a weapon during this act, and if so what sort of a weapon did you use.

ANSWER:

During this incident I deployed a shotgun from my patrol vehicle. Holding a subject at guard means pointing a firearm in their direction but not at them.

Officer Justin Voss's Responses to Plaintiff's ROG's & RFP's

Case No. 3:05-cv-00273-JWS

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